

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

COUNTER TERRORIST GROUP US,
COUNTERR GROUP, and J. K. IDEMA,

Plaintiffs,

- against -

AUSTRALIAN BROADCASTING CORP.;
a/k/a ABC AUSTRALIA; ABC
CORPORATIONS 1-100; LIZ JACKSON;
ERIC CAMPBELL; JOSEPH A CAFASSO;
EDWARD A. ARTIS; KNIGHTSBRIDGE
INTERNATIONAL, INC.; KNIGHTSBRIDGE
INTERNATIONAL HUMANITARIAN
RELIEF AND HUMAN IMPROVEMENT
PROGRAMS, INC.; ROBERT C. MORRIS;
PARTNERS INTERNATIONAL
FOUNDATION; WILLIAM JOHN HAGLER,
Both Individually and Severally, and DOES 1
through 7, inclusive,

Defendants.

08 Civ 2356 (DAB)

**NOTICE OF MOTION TO
DISMISS FOR LACK OF
PERSONAL JURISDICTION**

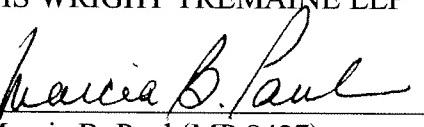
PLEASE TAKE NOTICE that, upon the annexed declaration of Defendant Liz Jackson, dated May 20, 2008, and the accompanying memorandum of law, and all other pleadings and proceedings, defendant Liz Jackson will move before this Court, Hon. Deborah A. Batts, United States District Judge, Southern District of New York, in Courtroom 24B of the United States Courthouse, 500 Pearl Street, New York, New York on the 5th day of August, 2008 or such other time and place as the Court may direct, for an order dismissing the complaint without prejudice for lack of personal jurisdiction, pursuant to Fed. R. Civ. P. 12(b)(2).

PLEASE TAKE FURTHER NOTICE THAT, pursuant to an agreement between the parties, plaintiffs' papers in opposition to the motion shall be due on July 21, 2008, and Ms. Jackson's reply papers in further support of her motion shall be due on August 4, 2008.

Dated: New York, New York
May 21, 2008

DAVIS WRIGHT TREMAINE LLP

By:



Marcia B. Paul (MP 8427)
Edward J. Davis (ED 1266)
Monica Pa (MP 3307)

1633 Broadway – 27th Floor
New York, New York 10019
Telephone: (212) 489-8230
Fax: (212) 489-8340

*Attorneys for Defendants
Australian Broadcasting Corp. and Liz Jackson*

TO:

J. K. Idema, *Plaintiff Pro Se*
12 Jonathan Lane
Poughkeepsie, NY 12603

John Edwards Tiffany, Esq.
Law Offices of John E. Tiffany P.C.
The Robert Treat Center
50 Park Place, 10th Floor
Newark, NJ 07102

Counsel for Plaintiff Counter Terrorist Group US